

UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

NATIONAL LABOR RELATIONS)	
BOARD,)	
)	
Petitioner,)	
)	
v.)	Case No. 15-10006-F
)	
GAYLORD CHEMICAL CO., LLC,)	
)	
Respondent.)	

MOTION FOR LEAVE TO INTERVENE OF CHARGING PARTY
UNITED STEEL PAPER AND FORESTRY, RUBBER,
MANUFACTURING, ENERGY, ALLIED INDUSTRIAL AND SERVICE
WORKERS INTERNATIONAL UNION, AFL-CIO-CLC
AND ITS LOCAL 887

This Motion for leave to intervene is filed by the party that initiated the Charge which is the subject of this enforcement action. The United Steel Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO-CLC and its Local 887 (“Union” or “USW”) is the Charging Party before the National Labor Relations Board (“Board”) in the decision and order of the NLRB reported at 361 NLRB No. 67, The Charging Party hereby moves this Court for an Order allowing it to intervene in the in accordance with Federal Rule of Appellate Procedure 15(d). In support of this Motion, the Union shows the following:

1. The Union filed the unfair labor practice charge which culminated in the NLRB decision and order at issue in this case. The Union thus has a compelling interest in the outcome of the case. *See* International Union, UAW v. Scofield, 382 U.S. 205, 208 (1965).

2. This Motion for Intervention is timely filed under Federal Rule of Appellate Procedure 15(d).

3. The Supreme Court has held that a Charging Party such as the Union is permitted to intervene in these proceedings as of right. International Union, UAW v. Scofield, 382 U.S. 205, 208 (1965).

Based on the foregoing, the Union respectfully requests this Court for an Order granting the Union the right to intervene in this proceeding.

Date: January 27, 2015

s/ Glen M. Connor

Glen M. Connor

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CERTIFICATE OF SERVICE

I hereby certify that I have filed the Union's **Motion For Leave To Intervene** via the Court's CM/ECF system with will notice and serve the following counsel:

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Dated: January 27, 2015

s/ Glen M. Connor
Glen M. Connor